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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. CR 15 0489 RS
	)	
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
	)	EXCLUDING TIME FROM OTHERWISE
v.	)	APPLICABLE SPEEDY TRIAL ACT
	)	CALCULATION
RANDOLPH EDMOND KNOBLOCK,	)	
ERIC SHELBY MELOVICH, and	)	
DOUGLAS LEE SMITH,	)	
	)	
Defendants.	)	

**STIPULATION**

IT IS HEREBY STIPULATED by the parties, through undersigned counsel, that:

1. The parties appeared before the Court on January 19, 2016 at 2:30 p.m. for a status hearing. Mr. Knoblock was present and represented by Federal Public Defender Stephen Kalar. Mr. Melovich was present and represented by Peter Goodman. Assistant United States Attorney Kathryn Haun appeared for the Government. The parties requested a continuance of the matter, with time excluded for effective preparation of counsel.

2. Accordingly, with the parties' agreement as to the new date, the Court scheduled another status hearing for March 29, 2016 at 2:30 p.m., with the understanding that the parties would submit a

1 Stipulation and Proposed Order excluding time.

2 3. The parties now formalize their request for a continuance of this matter to March 29,  
3 2016 at 2:30 p.m. for a status conference, and respectfully submit and agree that the period from January  
4 19, 2016 through and including March 29, 2016 should be excluded from the otherwise applicable  
5 Speedy Trial Act computation because the continuance is necessary for effective preparation of counsel,  
6 taking into account the exercise of due diligence.

7 4. The parties concur that granting the exclusion would allow the reasonable time necessary  
8 for effective preparation of counsel and continuity of counsel. *See* 18 U.S.C. §3161(h)(7)(B)(iv). The  
9 parties also agree that the ends of justice served by granting such an exclusion of time for the purposes  
10 of effective preparation of counsel outweigh the best interests of the public and the defendant in a  
11 speedy trial. 18 U.S.C. § 3161(h)(7)(A).

12  
13 IT IS SO STIPULATED.

14  
15 DATED: January 25, 2016

BRIAN J. STRETCH  
Acting United States Attorney

16  
17 /s/  
18 SARAH HAWKINS  
Assistant United States Attorney

19  
20 DATED: January 25, 2016

21 /s/  
22 STEPHEN G. KALAR  
Counsel for Randolph Edmond Knoblock

23  
24 DATED: January 25, 2016

25 /s/  
26 PETER GOODNAM  
Counsel for Eric Melovich

~~PROPOSED~~ ORDER


Based upon the above-described Stipulation, THE COURT FINDS THAT the ends of justice served by granting a continuance from January 19, 2016 through and including March 29, 2016 outweigh the best interest of the public and the defendant in a speedy trial, and that failure to grant such a continuance would unreasonably deny the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

Accordingly, THE COURT ORDERS THAT:

1. The parties shall appear before the Court on March 29, 2016 at 2:30 p.m. for further status conference.
2. The period from January 19, 2016 through and including March 29, 2016 is excluded from the otherwise applicable Speedy Trial Act computation, pursuant to 18 U.S.C. § 3161(h)(7)(A) & (B)(iv).

IT IS SO ORDERED.

DATED: 1/26/16

  
HON. RICHARD SEEBORG  
United States District Judge